

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION
OF THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX
REFUND SCHEME LITIGATION,

This document relates to 1:18-cv-05053-LAK

MASTER DOCKET

Case No. 1:18-md-02865-LAK

**NOTICE OF THIRD-PARTY DEFENDANT
ED&F MAN CAPITAL MARKETS, LTD.'S
MOTION FOR PROTECTIVE ORDER**

PLEASE TAKE NOTICE, that, upon the accompanying Declaration of Brian S. Fraser, dated September 13, 2019, and upon the accompanying Memorandum of Law, dated September 13, 2019; and upon all prior pleadings and proceedings had herein, Third-Party Defendant ED&F Man Capital Markets Ltd. (“ED&F Man”), through its undersigned counsel, will move this Court, pursuant to Fed. R. Civ. P. 5.2, before the Honorable Lewis A. Kaplan at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, Courtroom 21B, at a date and time to be determined by the Court, for a protective order to redact confidential party information from Exhibit C (Document 170-3) that was filed by ED&F Man in connection with ED&F Man’s Motion to Dismiss the Third Party Complaint (the “Motion to Dismiss”), and for such other and further relief as the Court deems just and proper.

Dated: September 13, 2019
New York, New York

AKERMAN LLP

By: /s/ Brian S. Fraser

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TO: All Counsel of Record (via ECF)